

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

SEALED

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

AXEL GIOVANY CASSEUS,

Case No.

22-6190-STRAUSS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 10, 2022, and March 11, 2022 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1) and 841(b)
(1)(C), and 18 U.S.C. § 2

Distribution of a Controlled Substance

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.



Complainant's signature

DEA Task Force Officer Thomas Moylan

Printed name and title

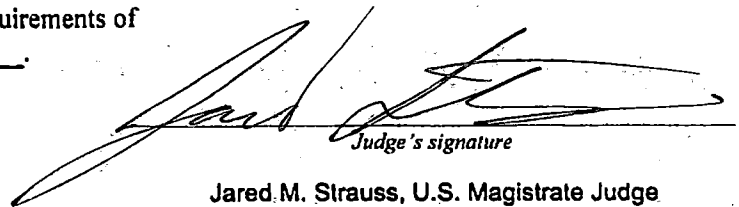
Attested to by the applicant in accordance with the requirements of
Fed. R. Crim. P. 4.1 by FaceTime

Date:

April 15, 2022

City and state:

Fort Lauderdale, Florida



Judge's signature

Jared M. Strauss, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Your affiant, Thomas Moylan, being duly sworn, deposes and states as follows:

INTRODUCTION

1. I am a Task Force Officer with the Drug Enforcement Administration ("DEA") and have served in this capacity since August 2020.¹ I am currently assigned to the DEA Miami Field Division, where I have been involved in investigations involving narcotics trafficking and money laundering. As a DEA Task Force Officer, I have participated in the execution of numerous search and seizure warrants, resulting in the seizure of illegal controlled substances, packaging materials, firearms, and other tools of the drug trade. I also participated in debriefings of narcotics traffickers, cooperating individuals, and sources of information. Through these debriefings, I have become familiar with the terminology, code words, and brand names used by drug dealers. In addition, I have testified before grand juries, resulting in federal indictments. I also have experience assisting in investigations that involve money laundering, and international drug trafficking and conspiracy.

2. As a law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), I am empowered by law to conduct investigations of and make arrests for, but not limited to, offenses enumerated in Titles 18, 21, and 46 of the United States Code.

3. I make this Affidavit in support of a criminal complaint charging Axel Giovany Casseus with distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

4. I submit this Affidavit based on my personal knowledge, as well as information provided to me by other individuals, including other law enforcement officials, and my review of

¹ I have been a law enforcement officer for over eight (8) years with the Fort Lauderdale Police Department (FLPD).

records and other evidence obtained during the course of this investigation. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for the requested warrant, it does not include every fact known to me about this matter.

PROBABLE CAUSE

Narcotics Overdose

5. On or about March 10, 2022, law enforcement responded to a residence located in Wilton Manors, Broward County, Florida (the "Wilton Manors residence") in reference to a medical emergency in which six (6) individuals, who were visiting the area for Spring Break, were exhibiting symptoms of a narcotics overdose. Medical personnel administered emergency aid to the victims and transported them to nearby hospitals. Of the victims, two of them ("Victim 1" and "Victim 2") had to be placed on ventilators to aid in their recovery. Fort Lauderdale Fire Rescue (FLFR) Hazardous Materials team subsequently arrived on scene and rendered the scene safe. While on scene, the Hazardous Materials team located suspect cocaine and submitted it for laboratory analysis. A forensic chemist later determined that the samples contained traces of both cocaine and fentanyl.

Events Leading Up to March 10, 2022, Emergency

6. On March 9, 2022, Victim 1 and Victim 2 met an individual – later identified as Axel Giovany Casseus – on Fort Lauderdale Beach. During the meeting, Casseus advised that he sold cocaine. Casseus subsequently provided telephone number (954) 860-6452 to Victim 1, which Victim 1 saved in his phone as "Gee fort Lauderdale plug."

7. After receiving Casseus' cellphone number, Victim 1 and Casseus had the following text message exchange:

TIME	SENDER	MESSAGE
3:52 PM	Victim 1	This tampa ²
3:53 PM	Casseus	ilk gang I got u with the deals

8. On March 10, 2022, the next day, Casseus and Victim 1 exchanged the following messages:

TIME	SENDER	MESSAGE
2:03 AM	Casseus	send location ima pull up rn
2:03 AM	Victim 1	[address of Wilton Manors residence]
2:04 AM	Casseus	u heard the price I said rigjt
2:05 AM	Victim 1	Yea
3:09 AM	Victim 1	[address of Wilton Manors residence]
3:27 AM	Victim 1	You pullin up still
3:28 AM	Casseus	ya just bout to go grab n heading your way
3:28 AM	Casseus	only good business
3:38 AM	Victim 1	Ight
5:40 AM	Casseus	fuck I just peeped I missed u my fault ill look out next time u cop south beach was too lit w the custos
10:26 AM	Victim 1	im already knowin Miami was jumpin
10:27 AM	Casseus	shit was too turnt
10:27 AM	Casseus	I dead been on the road till the am
11:11 AM	Victim 1	Can u slide thru now
11:45 AM	Casseus	yeah I got u still need a 8ball right
11:45 AM	Victim 1	Yea
12:17 PM	Casseus	same place ? im coming from damn near the same area I was last night
12:19 PM	Victim 1	Yea the last address I sent
12:19 PM	Casseus	ik im tellin u im coming from south beach
12:20 PM	Victim 1	Ight lmk when u close
12:42 PM	Casseus	fasho
2:50 PM	Casseus	15
2:50 PM	Casseus	the beach gotta be lit all this traffic on the highway
2:51 PM	Victim 1	Ight we and the address i sent
2:51 PM	Casseus	ik I just told u im 15 min from there
2:52 PM	Victim 1	Bet
2:52 PM	Casseus	how I looked again fam ? I met too much ppl yesterday
2:53 PM	Victim 1	Black jitt with waves
3:17 PM	Casseus	ight fasho
3:32 PM	Casseus	grab 2

² The address listed on Victim 1's Florida Driver's License is approximately twenty (20) minutes away from Tampa, Florida.

3:33 PM	Victim 1	im outside rn wassup
3:34 PM	Casseus	stopping to drop this off on this person right before yo place they grabbing 4 that's why I been a lil minute I had to weigh shit
3:35 PM	Casseus	then ima be at my last 2 for you grab both if u can gang
3:37 PM	Victim 1	Ight bet
3:54 PM	Victim 1	Lmk whats good gang
4:13 PM	Victim 1	How far out are u
4:13 PM	Casseus	I am stuck in traffic I aint far
4:14 PM	Casseus	n I wasn't driving gang if I was driving I woulda flew to u , ion like being on other ppl time u gon see how fucked up of the lean this nigga is rn
4:16 PM	Casseus	I was dead 10 min from u when I was giving them ppl the 4
4:18 PM	Victim 1	Lmao bet that gang my dawgs trying to go out so just lmk wats good
4:19 PM	Casseus	[sends screenshot from Google Maps of current location]
4:19 PM	Casseus	see that yellow are thats where im stuck at
4:20 PM	Casseus	on ninth ave
4:20 PM	Victim 1	Heard u
4:30 PM	Casseus	2 mins
4:32 PM	Casseus	[sends photograph from passenger side front seat of vehicle]
4:32 PM	Casseus	be outside
4:33 PM	Victim 1	Heard u
4:46 PM	Casseus	let ppl know im trynna gorw my face gang

9. Eyewitnesses confirmed that a red vehicle parked outside the Wilton Manors residence. From that vehicle, a black male in his twenties, approximately 6'1", skinny, with dreadlocks and a mustache or goatee, wearing black skinny jeans and a short sleeve black t-shirt exited. This description did not match Casseus. Victim 1 and Victim 2 provided money to the black male in exchange for cocaine. After completing the transaction, Victim 1 and Victim 2 brought the cocaine into the Wilton Manors residence and cut a portion of it into seven (7) lines for them and their friends to ingest. Eyewitness testimony further advised that once the six (6) individuals ingested the suspect cocaine, they began to show signs of overdosing.

10. At approximately 4:57 p.m., dispatch received the 911 call about the overdose.

Undercover Operation

11. On or about March 11, 2022, an undercover (UC) contacted Casseus through the phone number that he provided to Victim 1 on March 9, 2022. Through text messages and recorded phone calls, the UC arranged to purchase "2 eight balls" of "soft" – street slang for seven (7) grams of powder cocaine – from Casseus. Casseus agreed to sell the narcotics for one thousand dollars (\$1,000.00). Later that day, the UC arranged to conduct the controlled buy around 1800 South Federal Highway in Fort Lauderdale, Florida. The UC met with Casseus, who was in a white Tesla with three (3) males. The UC provided \$1,000.00 in BSO Official Investigative Funds (OIF) to Casseus for approximately forty-three and eight tenths (43.8) grams of a substance that later field-tested positive for cocaine. After the controlled buy, law enforcement monitored the white Tesla until they observed Casseus exit the Tesla in the area of 2501 North Ocean Drive, Hollywood, Florida. After exiting the vehicle, law enforcement took Casseus into custody. At the time of his arrest, Casseus had approximately six hundred dollars (\$600.00) on his person that contained the same serial numbers as the ones recorded from the OIF used for the purchase. Casseus was also in possession of a cell phone for the number (954) 860-6452 (see paragraph 6).

12. During a post-Miranda interview, Casseus admitted to selling the 43.8 grams of cocaine to the UC. Casseus also admitted to being in Wilton Manors on March 10, 2022, with a friend he referred to as "Vontae." Casseus claimed that "Vontae" sold cocaine to two (2) people that "Vontae" met on the Fort Lauderdale Beach the previous day. Casseus claimed that he (Casseus) did not make any money from the deal but that "Vontae" made between four hundred and five hundred dollars (\$400.00-\$500.00) from the transaction. Casseus further stated that he and "Vontae" went to the Wilton Manors residence in a red Toyota Corolla belonging to "Vontae."

Casseus described "Vontae" as a black male, skinny, with dreads and a mustache – consistent with the description that the eyewitness provided (see paragraph 9). Casseus claimed that "Vontae" was the one using Casseus' phone to arrange the transaction with the UC. However, when the UC reminded Casseus that she spoke to him on the phone, Casseus admitted that he did speak to the UC but claimed that "Vontae" told him what to say. Casseus claimed that "Vontae" supplied the cocaine and all Casseus did was add baking soda. Casseus claimed that he only profited one hundred dollars (\$100.00) from the transaction with the UC.³

13. Later in the interview, Casseus changed his story and claimed that "Vontae" was not at the Fort Lauderdale Beach on March 9, 2022; rather, it was Casseus, "Swizzy", and "Dre," adding that "Swizzy" was the one facilitating drug deals. Casseus stated that "Swizzy" met with a group of people who were on Spring Break and wanted to purchase narcotics. Upon hearing this, Casseus stated that he relayed the request to "Vontae". Casseus confirmed that he and "Vontae" then went to the Wilton Manors residence. Once they arrived, Casseus stated that "Vontae" conducted the narcotics transaction with a black male and white male.⁴

14. Casseus confirmed that his closest friends knew him as "G" – short for Giovanni. This is consistent with Victim 1's phone entry of "Gee fort Lauderdale plug" (see paragraph 6).

15. During the interview, law enforcement showed a photograph of an individual called "Vontae" from the cell phone to Casseus. Casseus positively identified that individual as the same "Vontae" who was with him when the narcotics transaction at the Wilton Manors residence occurred. It should be noted that at the time of his arrest, Casseus was equipped with a court ordered electronic monitoring device (ankle monitor) on unrelated state charges.

³ This is inconsistent with the \$600.00 OIF found on his person at the time of arrest.

⁴ Victim 1 is a black male, whereas Victim 2 is a white male.

Additional Investigation

16. Law enforcement obtained a search warrant for Casseus's cell phone. After executing the search warrant, law enforcement identified the phone number for "Vontae." Subscriber information for this number included the name "Vontae."

17. Law enforcement obtained a historical cell site warrant and a prospective cell-site warrant for Vontae's phone. The data from these warrants, License Plate Reader (LPR) information, and Casseus's ankle monitor revealed the following occurred on March 10, 2022:

- Casseus and "Vontae" were together at Vontae's residence.
- Both "Vontae" and Casseus travelled in Vontae's red Toyota Corolla to the Wilton Manors residence, arriving at approximately 4:35 p.m.
- Casseus and "Vontae" were at the residence for approximately one (1) minute before driving away.
- At approximately 5:08 p.m. Casseus and "Vontae" arrived at the Atlantic Hotel, located at 601 North Fort Lauderdale Beach Boulevard, Fort Lauderdale, Florida. Surveillance footage revealed both Casseus and "Vontae" exit Vontae's red Toyota Corolla and enter the hotel.

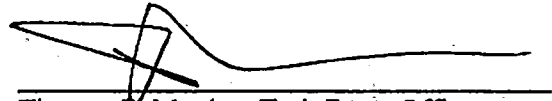
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CONCLUSION

18. Based upon the information provided above, there is probable cause to believe that Axel Giovany Casseus committed distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Respectfully submitted,


Thomas M. Moylan, Task Force Officer
Drug Enforcement Administration

Attested to by the applicant and in accordance with the requirements of Fed. R. Crim. P. 4.1 by Face Time on this 15th day of April, 2022.


JARED M. STRAUSS
UNITED STATES MAGISTRATE JUDGE